

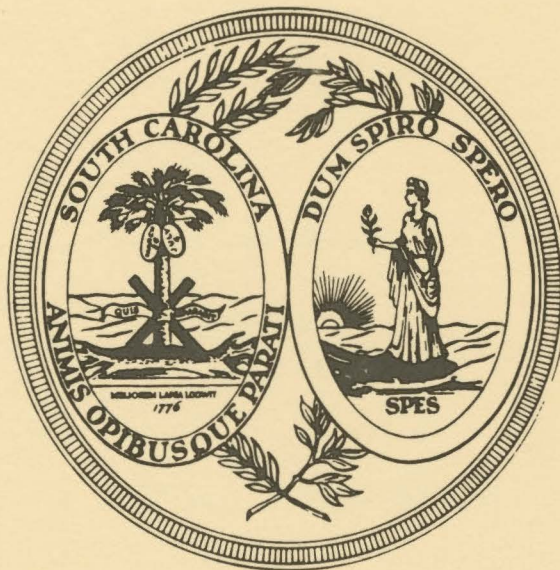
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South Carolina General Assembly



Legislative Audit Council



The State of South Carolina
General Assembly
Legislative Audit Council
Sunset Review of the
Board of Veterinary Medical Examiners
July 23, 1980

THE STATE OF SOUTH CAROLINA

GENERAL ASSEMBLY

LEGISLATIVE AUDIT COUNCIL

SUNSET REVIEW OF

BOARD OF VETERINARY MEDICAL EXAMINERS

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REPORT SUMMARY

Act 608 of 1978 mandates the establishment of "... A system for the Review, Termination, Continuation or Reestablishment of State Agencies, Boards, Departments and Commissions." This is commonly referred to as the "sunset" act. Under this section of the law the General Assembly has set up a process for the "systematic review" of certain governmental entities so that it might be in a "better position to evaluate the need for their continuation, reorganization or termination." Section 6 of the Act lists 40 agencies, boards and commissions which are to be reviewed and sets termination dates for these entities. The Board of Veterinary Medical Examiners is scheduled to terminate on June 30, 1981.

Veterinarians are an important link in the health care system of the State and play a major role in the areas of disease control and prevention. State regulation provides the public a way to identify those individuals which are qualified to practice veterinary medicine.

In its review of the Board, the Council noted several areas where improvements are needed. These are as follows:

- The Council examined the Board's administrative and regulatory duties and determined that in the near future there will be a need for full-time administrative staffing. The Board currently has one part-time employee. One possibility the Board should explore is the establishment of a centrally located administrative office in conjunction with other medically-oriented boards (see p. 6).

- The Board has not developed any reciprocal agreements with other states although there is a need to do so (see p. 10).
- The Council reviewed Board files concerning complaints and disciplinary action and found that 1) the Board needs to develop systematic policies and procedures regarding complaints, and 2) there is a need to develop the capability to investigate complaints. The Council's examination found that it was impossible to determine the total number of complaints received by the Board or the action taken. The Board should devise a system of handling complaints and disciplinary action and acquire the capability to investigate. In order to perform this task in the most economic fashion, the Board should acquire this capability in coordination with other medically-oriented boards (see p. 11).
- The Council found that the Board currently examines, certifies and regulates the profession of animal technician although it has no statutory authority in this area. The Board has been doing this for three years and has certified 52 animal technicians. This certification should be discontinued until the Board receives such authority from the Legislature (see p. 16).

Overall, the Council found that over the years the Board has performed its duties in an efficient and effective manner. However, there is a need for the Board to increase its capabilities to serve the public, especially in the area of complaints and professional oversight. The

recommendations in the report address these problems and propose solutions which are both economical and effective.

In performing this audit the Council examined Board files, records and memos. Interviews were held with several Board members and officials from other State agencies. Board policies, procedures and statutes were also examined. The following report is divided into two sections; Board Review and Sunset Issues and Evaluation.

BOARD REVIEW

Background

The Board of Veterinary Medical Examiners was created by Act 499 of 1920. Statutes governing the Board underwent major revision in 1974 and are found in the 1976 Code of Laws. The Board is composed of five members, each representing one of five multi-county districts. Each member is to be a "graduate of a recognized veterinary college," however, no more than three can be graduates of the same college. Two nominees for each vacancy are selected by the South Carolina Veterinary Medical Association. The Governor appoints one nominee to a five-year term. No member can serve more than two consecutive terms. The Board is required to meet at least once a year.

According to its Legislative Declaration of Purpose found in Section 40-69-10, the Board's function is to "... protect the public from being misled by incompetent, unscrupulous and unauthorized practitioners, and from unprofessional or illegal practices by persons licensed to practice veterinary medicine." In order to accomplish this, the practice of veterinary medicine is "... regulated in the interest of the health, safety and welfare of the citizens of South Carolina."

Budget and Staffing

During FY 78-79 Board expenditures totaled \$6,641 while revenue generated through fees totaled \$8,815 (see Table 1). The majority of funds was used for salaries. The FY 79-80 budget totals \$9,344 and reflects similar trends. The Board employs one part-time secretary. No Board office is maintained and all records are kept in the personal office of the Secretary-Treasurer of the Board located in Union, South Carolina.

TABLE 1

BOARD OF VETERINARY MEDICAL EXAMINERS

Statement of Revenue, Expenditures and Appropriations
Five Year Period Ending June 30, 1980

	<u>1975-76</u>	<u>1976-77</u>	<u>1977-78</u>	<u>1978-79</u>	<u>1979-80</u> (Estimated)
<u>Revenue Generated</u>					
Examination Fees	\$ 1,300	\$ 2,475	\$ 1,500	\$ 1,500	\$ 1,900
License Fees	4,502	4,413	4,205	7,315	8,100
Miscellaneous	25	250	-	-	-
Balance From Previous Year	11,129	*	*	*	*
Total Receipts	<u>\$16,956</u>	<u>\$ 7,138</u>	<u>\$ 5,705</u>	<u>\$ 8,815</u>	<u>\$10,000</u>
<u>Expenditures</u>					
Personal Service	\$ 2,649	\$ 3,120	\$ 3,120	\$ 3,643	\$ 4,713
Per Diem - Board	625	525	1,085	475	1,300
Travel	883	1,692	1,372	637	892
Telephone	174	165	335	253	400
Printing, Binding, Advertising	110	355	-	-	-
Examination Expenses	645	-	-	-	-
Office Supplies	-	106	136	288	100
Postage	196	104	200	180	200
Insurance	30	30	60	-	60
Dues	50	50	50	50	50
Fixed Charges	9	20	-	-	-
Employer Contributions	112	-	409	394	779
SCAV Scholarship Fund	3,000	-	-	-	-
Office Equipment	390	-	-	-	-
Other	51	150	169	-	-
Other Contractual Services	-	-	-	721	700
Office Equipment Repairs	-	-	-	-	75
Other Rental	-	-	-	-	75
Total Expenditures	<u>\$ 8,924</u>	<u>\$ 6,317</u>	<u>\$ 6,936</u>	<u>\$ 6,641</u>	<u>\$ 9,344</u>
<u>State Appropriations</u>	<u>-</u>	<u>\$ 6,474</u>	<u>\$ 7,556</u>	<u>\$ 6,976</u>	<u>\$ 9,344</u>

* In 1976 the Board came under the Comptroller General and these balances went into the General Fund.

Need for Administrative Staffing

The Audit Council inspected Board files for the past years and found that the Board has no effective system of filing, storage and record-keeping. This is because the informational needs of the State and the Board itself have outgrown the ability of the Board to maintain such information. Historically the Board's Secretary-Treasurer has handled most of the administrative duties for the Board. The current Secretary-Treasurer has held this position for over 35 years. At present the Board has one part-time clerical worker employed by the Board's Secretary/Treasurer and based in Union, South Carolina. This person, along with Board members, handles complaints, licensing, examination, annual license renewal and informational requests plus the specific administrative requirements of the State.

According to Board members much of the information requested or sent by other State agencies simply does not apply to an agency as small as this Board. Also, the Board has become much more active in recent years, especially in the areas of complaints, licensing and examination and disease control, thus necessitating additional support. Through examination of Board records the Council found that the work of the Board has increased rapidly in the past few years and will probably continue to grow at this pace.

Such growth will soon necessitate the need for additional administrative and clerical staff. In order to perform its functions in the most efficient and effective way the Board should examine all possibilities in this area. One option open to the Board is that of sharing full-time administrative staff with other medically oriented Boards. This would enable two or more Boards to maintain a full-time office in the State

Capital area to process licenses, handle complaints, transmit information and fulfill State requirements without significantly increasing administrative costs.

RECOMMENDATION

THE BOARD SHOULD EXPLORE THE POSSIBILITY
OF ADMINISTRATIVELY COMBINING WITH OTHER
REGULATORY BOARDS.

Licensure and Examination Process

Licensure

Section 40-69-80 of the 1976 South Carolina Code of Laws lists six qualifications an individual must meet in order to be licensed as a veterinarian. These are as follows:

1. Be a graduate of a school or college of veterinary medicine approved by the Board;
2. Be in good physical and mental health;
3. Be of good moral character;
4. Be a citizen of the United States;
5. Subscribe to and uphold the principles incorporated in Constitution of the United States;
6. Pay the required fee.

Upon fulfilling these requirements the candidate may stand for examination. The Board is also empowered to issue a temporary license to practice.

The Audit Council examined the requirements for licensure and found several areas in need of change. In the absence of a detailed physical and psychological examination, which the Board does not require, the "good physical and mental health" requirement is unenforceable and could discriminate against individuals which are handicapped yet capable of performing veterinary medicine. The United States citizenship requirement discriminates on the basis of nationality and may be unconstitutional. The requirement to uphold and defend the United States Constitution deals strictly with personal and political beliefs and does not measure the ability to practice veterinary medicine.

RECOMMENDATION

SECTION 40-69-80 SHOULD BE AMENDED TO OMIT
OR MODIFY LICENSURE REQUIREMENTS CONCERNING
(1) GOOD PHYSICAL AND MENTAL HEALTH, (2)
CITIZENSHIP, AND (3) UPHOLDING THE CONSTITUTION.

Examination

The veterinary examination process is divided into several parts. The first requirement is completion of the national examination. This exam is usually taken by applicants before they graduate from veterinary college, and is given by the Professional Examination Services, a national testing service located in Princeton, New Jersey. The second section is a written discussion exam prepared and graded for the Board by a veterinary consultant from Auburn University. The third section is a practical laboratory exam conducted at the Clemson University Experimental Station in Pontiac, South Carolina.

Each section of the examination process is graded and weighted by the Board. Generally a 70 or above is a passing grade, however, the benchmark grade is adjusted for each exam. Over the past five years an average of 83% of candidates passed the exam (see Table 2).

TABLE 2
STATISTICAL DATA ON THE EXAM FOR 1975-1979

<u>Date Given</u>	<u>Number Passed</u>	<u>Number Failed</u>	<u>Total Number Tested</u>	<u>Percentage Passing</u>
June 1975	26	6	32	81%
June 1976	20	6	26	77%
June 1977	40	4	44	91%
June 1978	23	9	32	72%
June 1979	29	2	31	93%

Fees

The Board charges fees for examination and annual licensure. Examination fees are \$50.00. License renewal fees are \$15.00 per year. According to several Board members, the Board obtains the permission of the South Carolina Veterinary Medical Association before increasing its fees. However, State law pertaining to the setting of fees provides that it is solely the Board's responsibility and authority to set licensing fees, not the Association's.

In FY 78-79 the fees charged by the Board totaled \$8,815. The Board estimates this will increase to \$10,000 in FY 79-80 and \$10,500 in FY 80-81.

Reciprocity

Of the 512 veterinarians registered in South Carolina, 250 practice out of state. Although there has been some negotiation concerning reciprocity with North Carolina, South Carolina has no reciprocal agreements with any other state. Anyone wishing to become licensed in the State must go through the examination process. According to State law, "the Board is authorized to enter into reciprocal agreements with other states having similar licensure requirements." Reciprocity is the process by which persons who have already completed veterinarian school and successfully met the requirements of another state are permitted to practice in South Carolina. These types of agreements between states should exist whenever possible in order to facilitate the free flow of expertise, talent and knowledge.

RECOMMENDATION

THE BOARD SHOULD MOVE TO PROMULGATE
RECIPROCAL AGREEMENTS WITH OTHER STATES
THAT HAVE SIMILAR LICENSURE REQUIREMENTS
AS SOUTH CAROLINA.

Need for a Complaints and Disciplinary System

The Audit Council examined the files and records of the Board and found that:

1. The Board has no complaint form or system of logging complaints.
2. Records concerning complaints are incomplete and are located in various places in the State.
3. The Board has little if any capability to investigate complaints.
4. There is no ensuring that all complaints received by the Board are investigated or that the complainant is contacted by the Board.

Overall, the Audit Council found that although complaints are received by the Board, there is no effective system to deal with the complaint after that point. This is primarily because the size and budget of the Board prohibits the maintenance of clerical and investigative staff for this purpose.

Regardless of the size of the staff or the frequency of complaints, there is a need for a State regulatory Board to be able to respond to the concerns and complaints of the public. Although, due to the nature of the Board's records, the Audit Council could not determine the total number and type of complaints, it appears that most allege the unlicensed practice of veterinary medicine (see Table 3).

TABLE 3
NUMBER AND TYPE OF COMPLAINTS BY YEAR

<u>Calendar Year</u>	<u>Unlicensed Practice</u>	<u>Incompetence</u>	<u>Unethical Practice</u>	<u>Total</u>
1977	1	-	-	1
1978	1	1	1	3
1979	3	1	1	4
1980	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>
TOTALS	<u>5</u>	<u>2</u>	<u>1</u>	<u>8</u>

According to Board records at least one person has been prohibited by the courts from practicing without a license. In addition, two licenses have been revoked by the Board recently due to the conviction of their holders on criminal charges. When a complaint is received, it is usually sent by the Board to the State Veterinary Association (if it is minor), or to the Attorney General's Office, or is handled by a Board member. In cases involving drug violations DHEC becomes involved. However, most of the time, these types of cases are of a lower priority at DHEC and the Attorney General's Office, therefore, it may be sometime before they are investigated.

Due to the lack of a complete complaints and disciplinary system, the Board is at a disadvantage in that (1) it is difficult to handle complaints quickly and adequately, (2) the Board must depend on other agencies to investigate and prosecute, and (3) the Board members must become heavily involved in the complaints and disciplinary process.

However, the public is at an even greater disadvantage because it is not adequately served by the current process and not protected to the extent that is necessary.

The Board has taken some measures to correct these deficiencies. At its June 1980 meeting the Board approved the use of a comprehensive complaint form and a system to log and record complaints. This system was developed in consultation with the Attorney General's Office.

RECOMMENDATIONS

THE BOARD SHOULD CONTINUE ITS EFFORTS IN THE AREA OF OBTAINING A SYSTEMATIC METHOD OF HANDLING COMPLAINTS. SUCH A SYSTEM SHOULD INCLUDE A CENTRAL FILE CONTAINING ALL CORRESPONDENCE AND A STANDARDIZED PROCEDURAL RESPONSE TO ALL COMPLAINTS.

THE BOARD SHOULD ACQUIRE THE CAPABILITY TO INVESTIGATE COMPLAINTS. IN ORDER TO PERFORM THIS FUNCTION IN THE MOST ECONOMICAL FASHION, THE BOARD SHOULD COORDINATE ITS EFFORTS IN THIS AREA WITH THOSE OF OTHER MEDICALLY-ORIENTED BOARDS.

Public Participation

Public notice is given of all Board meetings, however, according to one Board member, only other professionals regularly attend. The

Board relies upon the Association for publicity and educating the public concerning veterinary issues.

RECOMMENDATION

SECTION 40-69 SHOULD BE AMENDED TO PROVIDE
FOR THE ADDITION OF PUBLIC MEMBERS TO THE
BOARD OF VETERINARY MEDICAL EXAMINERS.

Professional Education

The Board has no requirements which mandate continuing education, however, the Board and the Association support the concept and have drafted minimum standards for continuing education. Those standards require a veterinarian to acquire ten credit hours of education per year. Hours may be earned at various seminars given by associations and schools. It is widely recognized that continuing education can be useful in increasing the competence of practitioners of any profession with the potential result of enhancing the health and welfare of the public. In considering this requirement the Board should look closely at such factors as (1) the availability of acceptable educational opportunity, (2) the method of deciding which events are sanctioned and how many units or hours they will count, and (3) what type of action will be taken for non-fulfillment of any requirements promulgated.

Veterinary Education and South Carolina

South Carolina does not have a school of veterinary medicine. Therefore, through an agreement with other states, in conjunction with

the Southern Regional Education Board (SREB), a number of "slots" are reserved for South Carolina students. In 1958 an interstate pact was made between 14 states coordinated by the SREB for the purpose of sharing educational services. The two services in which South Carolina is involved are optometry and veterinary medicine. During the past school year the State was allotted 13 slots per class at the University of Georgia and four per class at Tuskegee Institute in Alabama. For the class beginning in the fall of 1980, the number of slots at the University of Georgia will increase to 17.

The State pays these institutions a negotiated subsidy in return for holding these slots. The amount paid for the class entering in FY 79-80 is \$5,500 per student per year. For FY 80-81, the amount is \$6,250. This money is annually appropriated to the South Carolina Commission on Higher Education which, in turn, passes through the total amount to the institutions. Applications for acceptance for the slots are submitted and approved directly by the institution.

The State has a pre-veterinary medicine advisory committee appointed by Clemson University. When it was first initiated, the purpose of the committee was to establish a pre-veterinary medicine curriculum and select the students for application to these institutions. Currently, the committee limits itself to publicizing the program and aiding students in preparing their application.

According to a 1978 study conducted by the Commission on Higher Education, 92 of the 161 (57%) South Carolina students who graduated under this program were practicing in South Carolina. Those students made up 36% of the total practicing veterinarians in the State.

Unauthorized Regulation of Animal Technicians

Presently, the Board examines, certifies and regulates the actions of animal technicians even though it has no statutory authority to do so. Animal technicians are technical school graduates who are trained to aid a veterinarian much like a physician's assistant aids a doctor. Currently, in South Carolina only one technical school offers a two-year degree program in this area, however, it is offered in many other states. Candidates for certification take a test designed by the Board in conjunction with the technical school. According to Board records, animal technicians have been certified by the Board since 1977. No one has failed the exam (52 have passed) although five are currently on conditional approval. The examination fee is \$10 with an annual renewal fee of \$5. According to one Board member the Board began certifying animal technicians at the request of the technical school. Also, it is done because most other States regulate animal technicians. The Audit Council has examined the statutes governing veterinarians and finds no statutory authority which would permit the Board to regulate animal technicians. This fact was transmitted to the Board in a September 1979 correspondence from the Attorney General's Office which stated "... the Board does not have the authority to propose and adopt regulations on animal technicians."

The Board's actions in this area have several effects. Primarily, without statutory authority the Board cannot legally enforce any of its regulations concerning animal technicians including the examination process or fee collection. The Board cannot bar or interfere with the practice of an animal technician unless he/she is practicing veterinary medicine. In general, the Board cannot enforce what they do not have

the authority to enforce. Only when and if legislation amending the statutes governing the Board is passed can the Board legally regulate this field.

RECOMMENDATION

THE BOARD SHOULD CEASE IN THE REGULATION
OF ANIMAL TECHNICIANS UNTIL SUCH TIME AS
THIS REGULATION BECOMES ONE OF THE BOARD'S
LAWFUL DUTIES.

SUNSET ISSUES AND EVALUATIONS

Act 608 of 1978, known as the Sunset Law, contains a series of eight issues which must be addressed in the review of each agency. These requirements encompass the areas of efficiency and effectiveness which will help determine the termination, continuation, or reestablishment of the agency and will also supply to the General Assembly an indication of the agency's public responsiveness and regulatory compliance. A summary of these issues and Audit Council's responses are presented in the following section.

- (1) DETERMINE THE AMOUNT OF INCREASE OR REDUCTION OF COSTS OF GOODS AND SERVICES CAUSED BY THE ADMINISTERING OF THE PROGRAMS OR FUNCTIONS OF THE AGENCY UNDER REVIEW.

The programs and functions of the Board do not directly affect the cost of veterinary services in South Carolina. The primary function of the Board is the testing and licensing of veterinarians. Presumably the fees charged by the Board to licensees are passed on to consumers. The Audit Council found no measurable cost increases or reductions as a direct result of the existence or actions of the Board.

- (2) WHAT ECONOMIC, FISCAL AND OTHER IMPACTS WOULD OCCUR IN THE ABSENCE OF THE ADMINISTERING OF THE PROGRAMS OR FUNCTIONS OF THE AGENCY UNDER REVIEW.

The primary function of the Board is the testing, licensing and disciplining of veterinarians. If this function were to end, the

public would have no assurance that those who hold themselves out as veterinarians possess the necessary level of competence. Aside from the treatment of injuries to animals, veterinarians play an important role in the control of animal and human diseases. This is especially important in a State such as South Carolina where many people and millions of dollars are connected with dairy farming, cattle raising, poultry and pork production and other industries. Deregulation could result in a proliferation of unlicensed practitioners and untreated or unvaccinated animals. This would seriously endanger the public health.

- (3) DETERMINE THE OVERALL COSTS, INCLUDING MANPOWER, OF THE AGENCY UNDER REVIEW.

Agency expenditures in FY 78-79 totaled \$6,641, while total receipts were \$8,815. The projected FY 79-80 expenditures are \$9,344 (see p. 4).

- (4) EVALUATE THE EFFICIENCY OF THE ADMINISTRATION OF THE PROGRAMS OR FUNCTIONS OF THE AGENCY UNDER REVIEW.

The main function of the Board is the testing and licensing of applicants. The Board has developed standards and guidelines in this area and carries them out in an efficient manner. However, the Board needs to establish a more formal system of record-keeping. In order to do so and to carry out its other assigned duties

efficiently, the Board will require a full-time administrative staff in the near future. The Board should coordinate the development of a full-time administrative staff with other medically-oriented Boards and explore the possibility of one administrative staff performing work for several small boards (see p. 6).

- (5) DETERMINE THE EXTENT TO WHICH THE AGENCY UNDER REVIEW HAS ENCOURAGED THE PARTICIPATION OF THE PUBLIC AND, IF APPLICABLE, THE INDUSTRY IT REGULATES.

The Board meets several times a year and its meetings are open to the public. According to Board members and Council review of Board minutes, the public does not attend these meetings. The Board has no public members. By law the Board consists of five veterinarians (see p. 13).

- (6) DETERMINE THE EXTENT TO WHICH THE AGENCY DUPLICATES THE SERVICES, FUNCTIONS AND PROGRAMS ADMINISTERED BY ANY OTHER STATE, FEDERAL OR OTHER AGENCY OR ENTITY.

The Board does not duplicate the services, functions and programs of any other State, Federal or local government entity. Other Medical Boards regulate the practice of medicine on humans and DHEC regulates the licensing of all individuals approved to dispense controlled substances. The Board of Veterinary Medical Examiners is the only entity responsible for regulation of the practice of veterinary medicine.

- (7) EVALUATE THE EFFICIENCY WITH WHICH FORMAL PUBLIC COMPLAINTS FILED WITH THE AGENCY CONCERNING PERSONS OR INDUSTRIES SUBJECT TO THE REGULATION AND ADMINISTRATION OF THE AGENCY UNDER REVIEW HAVE BEEN PROCESSED.

The Board is in need of a system of receiving, recording and acting upon complaints in an efficient and timely manner. From existing records, the Council could not determine if all complaints had been effectively handled. The Board also needs the ability to investigate complaints in order to more effectively protect the public's health, safety and welfare (see p. 11).

- (8) DETERMINE THE EXTENT TO WHICH THE AGENCY UNDER REVIEW HAS COMPLIED WITH ALL APPLICABLE STATE, FEDERAL AND LOCAL STATUTES AND REGULATIONS.

The Board is not subject to any Federal or local legislation and is limited only by State of South Carolina law. The Audit Council reviewed all applicable laws and regulations pertaining to the Board and attempted to verify their consistent and equitable application within the legislative intent. By virtue of its regulation of animal technicians, the Board is in conflict with Section 40-69-220 of the 1976 South Carolina Code of Laws which excludes "veterinary nurses, aides, laboratory technicians, or other employees of a licensed veterinarian who administers medication or renders auxiliary or supporting assistance under the responsible supervision of such licensed veterinarian," from regulation.

APPENDIX

South Carolina
State Board of Veterinary Examiners

UNION, SOUTH CAROLINA 29379

June 23, 1980

F. P. CAUGHMAN, JR., D. V. M.
PRESIDENT
COLUMBIA, S. C. 29205

BRUNSON M. WESTBURY, D. V. M.
VICE-PRESIDENT
SUMMERVILLE, S. C. 29483

H. L. SUTHERLAND, D. V. M.
SECRETARY-TREASURER
UNION, S. C. 29379

ELGIE E. NISSEN, D. V. M.
MEMBER
MARION, S. C. 29571

J. C. FRAZIER, D. V. M.
MEMBER
GREENVILLE, S. C. 29602

Legislative Audit Council
500 Bankers Trust Tower
Columbia, South Carolina 29201

ATT: Mr. Larry Fernandez

Re: Audit of the South Carolina Board of Veterinary
Medical Examiners by the Legislative Audit Council.

Sirs:

The South Carolina Board of Veterinary Medical Examiners wishes to thank you for the in depth study and interest in functions of our Board.

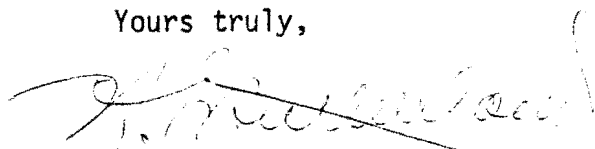
We are in agreement with your findings and recommendations. With the approval of the South Carolina Board of Veterinary Examiners and the South Carolina Association of Animal Technicians, we recommend the passage of House Bill #3943 to amend Chapter 69 of Title 40 Code of Laws of South Carolina, 1976, relating to Veterinary Medicine, so as to provide for the certification of Animal Health Technicians.

The recommendation that a standard procedure for handling complaints has already been complied with. A copy of the form that has been adopted is enclosed.

The Board agrees to the recommendation that certain requirements for candidates for Veterinary Licensure be clarified or eliminated from the Practice Act.

The Board favors a workable plan for requirement of continuing Professional Education for practicing Veterinarians.

Yours truly,



H. L. Sutherland, D. V.M.
Sec.-Treas.